

TCEQ, Air Permits Division
Bulk Fuel Terminals & Site-Wide GOP Holder Stakeholder Group
November 20, 2003
1:00 pm - 2:00 pm
TCEQ, Bldg. E, Rm 201S

Minutes

- I Opening Remarks Tara Capobianco**
- II Background or Update Information Beryl Thatcher**
In June 2001, 30 Texas Administrative Code (TAC) Chapter 122 revisions became effective, which included new source review (NSR) as an applicable requirement in federal operating permits. In October 2001, the Bulk Fuel Terminal General Operating Permit (GOP) was revised, which required applications to include NSR permits. In May 2002, the Site-Wide GOP was revised as well. The TCEQ must now codify all NSR permits into the GOP itself.
- III Discussion Topics**
- A. General Operating Permits Beryl Thatcher**
Title 40 Code of Federal Regulations Part 70 requires GOPs only be issued for similar sources. This action will result in the exclusion of any source with a case-by-case NSR permit from being authorized under a GOP. The GOPs will be revised to include PBRs and standard permits applicable to those GOP sources and any source with a case-by-case NSR permit will no longer be authorized under a GOP. As such, sources only authorized by PBRs and standard permits will qualify for GOPs. Bulk Fuel Terminals and most sites authorized under the Site-Wide GOP cannot be permitted only with PBRs and standard permits. Bulk Fuel Terminal and Site-Wide GOP permit holders will be required to submit site operating permit (SOP) applications no later than September 1, 2004. Bulk Fuel Terminal and Site-Wide GOP permit holders will continue to be authorized by the GOP and must certify compliance with the GOP until their SOP is issued. Once all SOPs have been issued for the Bulk Fuel Terminal and Site-Wide GOP permit holders, the Bulk Fuel Terminal GOP Number 515 and Site-Wide GOP Number 516 will be rescinded.
- B. Implementation Beryl Thatcher**
The revised GOPs will go to public notice on December 5, 2003 for a 30-day public comment period. The GOP should become effective in June 2004 and applications submitted no later than September 1, 2004. The TCEQ is currently reviewing options for possibly minimizing the application requirements for those GOP permit holders required to apply for a SOP.
- C. Open Discussion Open Discussion**
1. Is the only revision to the GOP the date to submit a SOP application? Yes.
 2. How will guidance be distributed? Letters to permit holders will be sent. Emails will be sent to stakeholder group and those subscribed to the Listserver. Web guidance will be updated and an announcement posted on our webpage.
 3. If we have an initial application in house can they be converted to SOP applications? Those are currently being held and no action taken. We are evaluating what will be required in the application and if we can use previously submitted applications.

4. What is the difference between listing NSR in applications and codifying the NSR authorizations in the GOP itself? The NSR authorizations must go through the Title V public notice process. In order for the public to be able to comment on all the NSR authorizations, they must be in the GOP itself.
5. Can the public comment on the NSR permits? Any comments received will be evaluated to determine if the permits meet the requirements of Title V (such as monitoring). In response to comments received, staff members will not evaluate best available control technology (BACT) or emission limits.
6. At what point are NSR authorizations being certified? Certification of NSR authorization is required now and has been required since the GOPs were revised to include NSR as an applicable requirement.
7. Is there a compliance assurance monitoring (CAM) or periodic monitoring problem? Permit holders with units subject to CAM must submit CAM plans when applying for an SOP. Additional periodic monitoring may also apply.
8. What is the practical difference between NSR and Title V notice requirements? NSR and Title V permits are two distinct programs which require different reviews. The NSR permit review includes a protectiveness review and a BACT review. The Title V review includes a determination of the site's applicable requirements and a review of the monitoring requirements. As such, the public has the opportunity to comment on different aspects of air permitting for the two different permitting actions.
9. 90 days is too short of a time to apply for the application. The TCEQ will consider this, however we are notifying all permit holders well in advance of this change.
10. Why does Texas still have two separate permits? NSR was originally not an applicable requirement of the Title V program and has continued to have a two permit system since NSR was included as an applicable requirement.

IV Closing Remarks/Action Items Tara Capobianco

V Next Meeting Date

No meeting has been scheduled. Stakeholders will be notified of any upcoming meetings via the listserver.

MEETING ATTENDEES

TCEQ, Air P
Bulk Fuel Terminals & Site-Wid
Novemb
1:00 pm
TCEQ, Bldg

Bulk Fuel Terminal

Sign-I

Attendee Name
(Please Print Legibly)

Don Pore

Jesse Alonzo

Brenda Baxter

Lynn Reed

A. S. Shankar

Pat Shevlin

Gail Worrell

Rachel Trainer

Sara Hutson

Attendee Name
(Please Print Legibly)

Larry W. Minton

John P. Henry

Juan J. Pinos

Jon Fields

Melissa Ryan

Tony Jabon

Scott Peters

Malcolm Graham

Ed FIESINGER

Carole Stapper

Rosalydia Penta-U

David Lundy